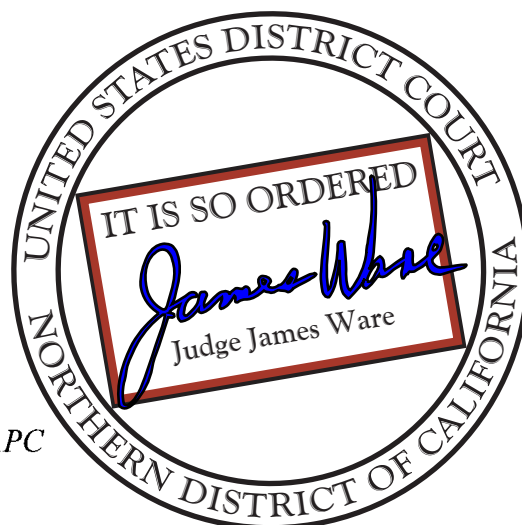


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Attorney for Plaintiff  
BARRY KLIFF



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BARRY KLIFF,  
Plaintiff,

vs.

HEWLETT-PACKARD COMPANY, a  
Delaware Corporation, YVONNE HUNT,  
an individual; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. C-05-01438 JW

**STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING DISCOVERY  
CUT-OFF DATE AND EXPERT WITNESS  
DISCLOSURE DATES**

WHEREAS, the Court's August 3, 2005 Scheduling Order set: (1) July 21, 2006, as the date on which discovery closes, and (2) May 19 and 29, 2006, as the dates for disclosure of expert witnesses and rebuttal expert witnesses, respectively;

WHEREAS, the parties agree that after completing one more deposition, scheduled for May 25, 2006, the case will be ripe for Defendant to file a summary judgment motion;

WHEREAS, the parties agree that it is in their best interests to litigate Defendant's summary judgment motion before expending further time and resources completing discovery, including additional depositions and expert discovery;

WHEREAS, the parties have agreed on July 24, 2006, as the summary judgment hearing date;

WHEREAS, the parties have not previously requested any continuance and do not by this stipulation intend to affect any other dates in the Court's August 3, 2005 Scheduling Order;

THEREFORE, the parties stipulate and hereby respectfully request that the Court issue an order continuing: (1) the discovery cut-off date to September 21, 2006, and (2) the expert witness and rebuttal expert witness disclosure dates to August 18 and 28, 2006, respectively.

MORGAN, LEWIS & BOCKIUS LLP

DATED:

5/04/06

Alexander Nestor  
Attorneys for Defendant Hewlett-Packard  
Company

LAW OFFICES OF BARRY B. KAUFMAN, APC

DATED:

Barry B. Kaufman  
Attorney for Plaintiff Barry Kliff

**ORDER**

Pursuant to the parties' STIPULATION, and GOOD CAUSE having been shown therefor,  
IT IS SO ORDERED:

DATED:

MAY 5, 2006

The Honorable James Ware  
United States District Judge

1 WHEREAS, the parties agree that it is in their best interests to litigate Defendant's  
2 summary judgment motion before expending further time and resources completing discovery,  
3 including additional depositions and expert discovery;

4 WHEREAS, the parties have agreed on July 24, 2006, as the summary judgment hearing  
5 date;

6 WHEREAS, the parties have not previously requested any continuance and do not by this  
7 stipulation intend to affect any other dates in the Court's August 3, 2005 Scheduling Order;

8 THEREFORE, the parties stipulate and hereby respectfully request that the Court issue an  
9 order continuing: (1) the discovery cut-off date to September 21, 2006, and (2) the expert witness  
10 and rebuttal expert witness disclosure dates to August 18 and 28, 2006, respectively.

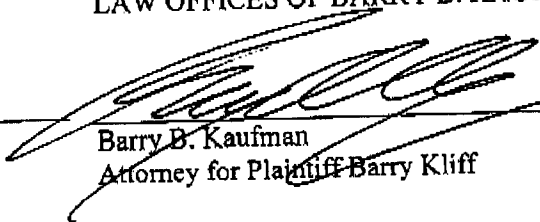
11 MORGAN, LEWIS & BOCKIUS LLP

12  
13 DATED: \_\_\_\_\_

Alexander Nestor  
Attorneys for Defendant Hewlett-Packard  
Company

16 LAW OFFICES OF BARRY B. KAUFMAN, APC

17  
18 DATED: May 4, 2006

  
Barry B. Kaufman  
Attorney for Plaintiff Barry Kliff

21 **ORDER**

22 Pursuant to the parties' STIPULATION, and GOOD CAUSE having been shown therefor,  
23 IT IS SO ORDERED:

24  
25  
26 DATED: \_\_\_\_\_

The Honorable James Ware  
United States District Judge